

WP 05-WH1723

Revision 8

**Underground RH
Transuranic Mixed Waste
Disposal Area Inspections**

Technical Procedure

EFFECTIVE DATE: 06/24/09

Randy Britain
APPROVED FOR USE

CONTINUOUS USE PROCEDURE

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INTRODUCTION ^{1, 2, 3}

This procedure provides guidance for performing inspections of Underground (U/G) Remote-Handled (RH) Transuranic (TRU) Mixed Waste Disposal Areas.

Performance of this procedure generates the following record(s), as applicable:

- Attachment 1 - Preoperational Underground RH TRU Mixed Waste Disposal Area Inspections
- Attachment 2 - Preoperational Waste Handling Mode Checklist

REFERENCES

BASELINE DOCUMENTS

- Title 40 *Code of Federal Regulations* (CFR) §264.15, "General Inspection Requirements"
- 40 CFR Part 264 Subpart I, "Use and Management of Containers"
- 40 CFR Part 761, Subpart C, "Marking of Polychlorinated Biphenyls (PCBs) and PCB Items"
- DOE/WIPP-07-3372, *Waste Isolation Pilot Plant Documented Safety Analysis*
- DOE/WIPP-07-3373, *Waste Isolation Pilot Plant Technical Safety Requirements*
- Hazardous Waste Facility Permit, Waste Isolation Pilot Plant, Permit #NM4890139088 SDF, Issued by New Mexico Environment Department
- 00CD-0001, Waste Isolation Pilot Plant Mine Ventilation Plan
- WP 13-1, Washington TRU Solutions LLC Quality Assurance Program Description

REFERENCED DOCUMENTS

- WP 04-AD3001, Facility Mode Compliance
- WP 04-AU1007, Underground Openings Inspections
- WP 04-IM1000, Issues Management Processing of WIPP Forms
- EA04IM1000-1-0, WIPP Form

PRECAUTIONS AND LIMITATIONS

The Technical Safety Requirements (TSRs) contains Limiting Conditions for Operations (LCOs) and Specific Administrative Controls (SACs) which provide specific preventative or mitigative limits and required actions for identified accident scenarios. Failure to comply with LCOs or SACs may constitute a violation and must be immediately reported to the Facility Shift Manager (FSM). The step affected by the LCO/SAC is followed by the LCO/SAC number in bold brackets (e.g., [**LCO 3.X.X**]).

Applicable LCO/SAC Surveillance Data Sheets SHALL be completed as required per WP 04-AD3001, prior to utilizing equipment selected for use.

The specific safety requirements that apply during performance of this procedure are as follows:

- **SAC 5.1.1.3**, Ground Control Program, states a program SHALL be established, implemented, and maintained to initiate remedial action for unstable ground conditions and to characterize, monitor, and trend salt behavior. Ground Control Inspections SHALL be conducted weekly. Performance of certain steps in this procedure and completion of the Data Sheet(s) for **SAC 5.1.1.3** demonstrates compliance with these requirements.
- Only personnel qualified as a RH Waste Handling Technician/Engineer (WHT/WHE), or trainees operating under direct supervision of a qualified RH WHT/WHE, are authorized to perform Waste Handling activities specified in this procedure.
- If procedure cannot be performed as written, WHE must be notified.

PREREQUISITE ACTIONS

- 1.0 Review previous inspection results for outstanding Action Requests (ARs) and outstanding deficiencies.
- 2.0 If a required inspection goes delinquent, perform the following:
 - 2.1 Immediately notify the FSM and Site Environmental Compliance (SEC) of the delinquent inspection.
 - 2.2 Schedule and complete the inspection.
 - 2.3 Document the following in a letter to SEC within five working days:
 - Schedule for inspection
 - Reason(s) why inspection was not performed

- Any measures taken to offset negative impacts resulting from not performing the inspection
- Actions to prevent further delinquencies

2.4 Waste Handling Operations (WHO), **GO TO** WP 04-IM1000 and determine if a WIPP Form (EA04IM1000-1-0) is required.

PERFORMANCE

1.0 PREOPERATIONAL UNDERGROUND INSPECTION

1.1 **IF** personnel are to be working in an active U/G RH TRU Mixed Waste Disposal Area,
THEN, at the start of the first shift-of-day, inspect areas per Attachment 1, as follows [**SAC 5.1.1.3**]:

1.1.1 Enter date and time of inspection in appropriate blocks.

1.1.2 Inspect the applicable item/condition listed on Attachment 1 **AND** enter check (✓) for satisfactory items/conditions, U for any unsatisfactory items/conditions, **OR** actual value required.

1.1.3 Initial applicable block.

1.1.4 **IF** any item/condition is unsatisfactory,
THEN perform the following:

- Describe exact location and nature of deficiency in Remarks Section.
- Notify WHE.
- Initiate and record AR for corrective action, as applicable.

1.1.5 Inspector, enter printed name, signature, date, and initials on Attachment 1 when inspection completed.

1.2 Submit inspection sheet to reviewer upon completion of Preoperational Inspection.

1.3 Reviewer, initial Attachment 1 after review of inspection items.

2.0 PREOPERATIONAL MODE CHECKLIST

2.1 Operator, after equipment preoperational checks are completed, perform the following:

2.1.1 Ensure date has been entered.

2.1.2 Initial the applicable block.

2.1.3 Operator, enter printed name, signature, and initials on Attachment 2 when preoperational checks are completed.

2.1.4 After all applicable blocks are completed, notify surface WHE for mode. Initial block and enter time.

2.1.5 WHE, **GO TO** WP 04-AD3001 and complete applicable section of procedure for RH Waste Handling Mode in the U/G, **THEN GO TO** Step 2.1.7.

2.1.6 WHE, upon completion of Waste Handling activities for shift, **GO TO** WP 04-AD3001 and complete applicable section of procedure to exit Waste Handling Mode.

2.1.7 Upon completion of last preoperational mode checklist for the week, forward Attachment 2 to WHE for validation.

3.0 REVIEW

3.1 WHE, perform the following:

3.1.1 Review Attachment 1 for unsatisfactory conditions, corrective actions taken, and outstanding or newly generated ARs.

3.1.2 Enter initials in block provided for specific day.

3.1.3 Upon completion of last inspection documented on Attachment 1, validate inspection(s) by printing name, signing, and dating inspection sheet in spaces provided.

3.1.4 Upon completion of all checklist items on Attachment 2, validate by printing name, signing and dating.

3.1.5 Forward Attachments 1 and 2, to Records Coordinator.

Attachment 2 - Preoperational Waste Handling Mode Checklist

PREOPERATIONAL WASTE HANDLING MODE CHECKLIST							
Date							
41-Ton Forklift							
20-Ton Forklift							
52-H-007C 6-Ton Forklift							
HERE*							
Underground Area Inspection							
Requesting Mode to Surface WHE / Time							

N/A = Not applicable

OOS = Out of Service

*Pre-evolution

Remarks: _____
